REMARKS

The Examiner has rejected Claim 10-18, 29 and 23 under 35 U.S.C. 101 for not incorporating a computer readable medium. Such rejection has been avoided by virtue of the clarifications made hereinabove to Claim 23 and the cancellation of Claims 10-18 and 29.

The Examiner has rejected Claim 21 under 35 U.S.C. 112 as being incomplete for omitting the essential element of how "event handlers" are determined and loaded. Such rejection has been avoided by virtue of the clarification made hereinabove to such claim.

The Examiner has further rejected Claims 1-23 under 35 U.S.C. 103(a) as being unpatentable over Adams et al. (U.S. Patent No. 5,778,350) in view of Williams et al. (U.S. Patent No. 6,032,147). Applicant respectfully points out that such rejection of Claims 1-29 has been avoided in view of the cancellation of such claims made hereinabove. In addition, applicant respectfully disagrees with such rejection of Claims 20, 21 and 23 in view of the amendments made hereinabove. Specifically, each of such independent claims have been amended to include the subject matter of former Claims 9 and 22, as well as additional limitations believed to be novel when taken in combination with the remaining limitations.

Regarding independent Claims 20, 21 and 23, the Examiner relies on Williams' disclosure of a "conversion engine" that "convert[s] a particular field or an entire record" to make a prior art showing of applicant's claimed "selecting action events based on the input source". (See Williams Col. 10 lines 45-47) Williams' invention includes a record conversion device that converts input records of one format into a different format depending on the output device. (See Williams Abstract) This limited function of converting does not encompass applicant's claimed "selecting action events," let alone such selection based on the input source.

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To further distinguish Williams, applicant has clarified the claimed "action events" to include action events that <u>operate on the network accounting information,</u> which specifically include <u>usage metering, tracking, correlating, and/or aggregating.</u> (See each of the independent claims) After a careful review of Williams, it is clear that there is not even a suggestion of applicant's above claimed action events.

In addition, the Examiner has relied on Williams' disclosure of transmitting a converted transaction record to an output host to make a prior art showing of applicant's claimed "executing the selected action events on the records." (See Williams Col. 12 lines 25-34) Applicant respectfully asserts that simply transmitting a converted record does not suggest applicant's claimed execution of <u>selected action events.</u>

Nevertheless, applicant has further distinguished Williams by clarifying that the execution of selected action events includes <u>discarding records stored during the execution of previous action events, parsing configuration data associated with the selected action events, and utilizing the parsed configuration data.</u> (See former claim 22, presently incorporated into each of the independent claims)

Applicant respectfully asserts that the Examiner's reliance on Williams' disclosure of <u>converting</u> an application and sending it to a message interface (Col. 8 lines 21-32) and Adams' disclosure of <u>formulas</u> stored in a table for collecting and processing output data (Col. 7 line 40-Col. 8 line 29, Abstract) does not even suggest applicant's claimed <u>discarding records, parsing configuration data,</u> and <u>utilizing the parsed configuration data.</u>

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable

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expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck,*947 F.2d 488, 20 USPQ2d 1438 (Fed.Cir.1991).

Applicant respectfully asserts that at least the third element of the *prima facie* case of obviousness has not been met, since the prior art references, when combined, fail to teach or suggest all of the claim limitations, as noted above. A notice of allowance or a specific prior art showing of all of applicant's claim limitations, in combination with the remaining claim elements, is respectfully requested.

Despite the foregoing paramount deficiencies in the excerpts relied upon by the Examiner and in the spirit of expediting the prosecution of the present application, applicant has amended each of the independent claims to include the following subject matter to ensure that the combination of Adams and Williams is clearly distinguished:

> "wherein multiple action events are executed in parallel;
>
> ...
>
> wherein a configuration event defines a plurality of action events by specifying code capable of executing each action event" (see each of the independent claims).

Again, a notice of allowance or a specific prior art showing of each of the foregoing claim limitations, in combination with the remaining claim elements, is respectfully requested.

Still yet, applicant brings the following subject matter of new Claims 24-39 to the Examiner's attention, for full consideration:

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"wherein the configuration data is written in an XML format" (see Claim 24);

"wherein the configuration data includes an XML header, a tables section, an input section, and an events section" (see Claim 25);

"wherein the tables section includes a name attribute, a poolsize attribute, and a flushhandlers attribute" (see Claim 26);

"wherein the input section includes a name attribute, a type attribute, and a handlers attribute" (see Claim 27);

"wherein the handlers attribute contains a list of events that are triggered when each record arrives at the input source" (see Claim 28);

"wherein the configuration data includes a fields section" (see Claim 29);

"wherein the fields section includes a name attribute, a type attribute, a key attribute, an overflow attribute, and a comment attribute" (see Claim 30);

"wherein the configuration data includes a timeouts section" (see Claim 31);

"wherein the timeouts section includes a type attribute and a period attribute" (see Claim 32);

"wherein the configuration data includes a params section" (see Claim 33);

"wherein the params section includes a name attribute and a value attribute" (see claim 34);

"wherein the events section includes a name attribute" (see Claim 35);

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"wherein the network accounting information includes a session source, destination, user name, duration, time, date, type of server, and volume of data transferred" (see Claim 36);

"wherein an initialization event is executed for preparing for the receipt of the records" (see Claim 37);

"wherein the initialization event includes reading the configuration data, creating tables, and creating input sources" (see Claim 38); and

"wherein creating the input sources utilizes the configuration data" (see Claim 39).

Again, a notice of allowance or a specific prior art showing of each of the foregoing claim limitations, in combination with the remaining claim elements, is respectfully requested.

Reconsideration is respectfully requested.

In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 505-5100. The Commissioner is hereby authorized to charge any fees that may be due or credit any overpayment to Deposit Account No. 50-1351 (Order No. XACTP007).

Respectfully submitted,

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